# UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS **EL PASO DIVISION**

CLERK, U.S. DISTRICT COURT WESTERN DISTRICT OF TEXAS Bv: DT Deputy

| UNITED STATES OF AMERICA,                                  | §                               | Case No: EP:25-CR-00652-LS  |
|--|---------------------------------|---|
| Plaintiff,   | 8                               | <u>INDICTMENT</u>   |
| <b>v.</b>  | \<br>\<br>\<br>\<br>\<br>\<br>\ | CT 1: 18 U.S.C. § 111(a)(1) – Assaulting, Resisting, or Impeding Certain Officers or    |
| (1) JEAN CARLOS CHAVEZ<br>GUTIERREZ,                       | \$<br>\$<br>\$                  | Employees Causing Physical Contact  |
| (2) LUIS RAMON BATISTA ROMERO,<br>(3) LUIS DANIEL CASTILLO | 8 8                             | CTS 2-4: 18 U.S.C. § 111(a)(1) – Assaulting, Resisting, or Impeding Certain Officers or |
| PEROZO, and  | §                               | Employees   |
| (4) BRUNO EMILIO CASTILLO COLMENAREZ,                      | <b>§</b>                        |   |
| Defendants.  | §<br>§                          |   |

THE GRAND JURY CHARGES:

## **COUNT ONE**

On or about February 5, 2025, in the Western District of Texas, Defendant,

# (1) JEAN CARLOS CHAVEZ GUTIERREZ,

intentionally, forcibly assaulted, resisted, opposed, impeded, intimidated, and interfered with A.V., a person designated in 18 U.S.C. § 1114, to wit: kicking the body of and causing physical contact with A.V., an ICE Contract Detention Officer who was engaged in official duties, in violation of Title 18, United States Code, Section 111(a)(1).

#### **COUNT TWO**

On or about February 5, 2025, in the Western District of Texas, Defendant,

(2) LUIS RAMON BATISTA ROMERO,

intentionally, forcibly assaulted, resisted, opposed, impeded, intimidated, interfered with, a person designated in Title 18, United States Code, Section 1114, that is, A.V., an ICE Contract Detention Officer, in violation of Title 18, United States Code, Section 111(a)(1).

#### **COUNT THREE**

On or about February 5, 2025, in the Western District of Texas, Defendant,

## (3) LUIS DANIEL CASTILLO PEROZO,

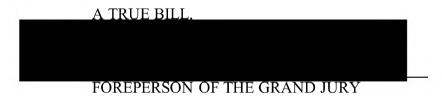
intentionally, forcibly assaulted, resisted, opposed, impeded, intimidated, interfered with, a person designated in Title 18, United States Code, Section 1114, that is, H.M., an ICE Contract Detention Officer, in violation of Title 18, United States Code, Section 111(a)(1).

# **COUNT FOUR**

On or about February 5, 2025, in the Western District of Texas, Defendant,

#### (4) BRUNO EMILIO CASTILLO COLMENAREZ,

intentionally, forcibly assaulted, resisted, opposed, impeded, intimidated, interfered with, a person designated in Title 18, United States Code, Section 1114, that is, U.M., an ICE Contract Detention Officer, in violation of Title 18, United States Code, Section 111(a)(1).



MARGARET F. LEACHMAN **ACTING UNITED STATES ATTORNEY** 

BY: José Luis Honzals
Assistant U.S. Attorney